

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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LIBERTY MUTUAL FIRE INSURANCE  
COMPANY AND LIBERTY INSURANCE  
CORPORATION,

Plaintiffs,

v.

SPRING CITY ELECTRICAL  
MANUFACTURING COMPANY AND SCF  
INVESTMENTS, INC. AND MILLER AND  
BRINK OF CALIFORNIA, INC. AND  
WESTERN LIGHTING CO.,

Defendants.

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Civil Action No. 02-2785

**MOTION FOR LEAVE TO FILE  
AMENDED COMPLAINT**

To: Leonard A. Busby, Esq.  
Montgomery, McCracken, Walker  
& Rhoads, LLP  
123 South Broad Street  
Philadelphia, PA 19109-1030

**PLEASE TAKE NOTICE** that the undersigned counsel *pro hac vice* for plaintiffs hereby applies to the United States District Court for the Eastern District of Pennsylvania, the Honorable Marvin Katz, Senior Judge, for an Order granting plaintiff leave to file an amended complaint in the form annexed to the accompanying affidavit of Jonathan M. Kuller, Esq.

This motion is not contested, to plaintiff's knowledge.

A proposed form of Order is submitted herewith.

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Dated: September 18, 2002  
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